

# Exhibit D



DIRECT DIAL NUMBER:  
(215) 575-7288

Linda Dale Hoffa  
lhoffa@dilworthlaw.com

May 10, 2016

**VIA UPS OVERNIGHT DELIVERY**

John Galanis  
15575 Jimmy Duarte Blvd  
Suite 1014  
Del Mar, CA 92014

RE: In the Matter of Hughes Capital Management (NY-9298) -  
SEC Subpoena to Timothy B. Anderson, Esq.

Dear Mr. Galanis:

By email dated May 3, 2016, you asserted your intention to claim attorney client privilege with regard to documents subpoenaed from my client, Tim Anderson, by the SEC relating to Burnham Securities, Inc. (BSI) and the Wakpamni Lake Community Corporation bond deals.

I have enclosed for your privilege review a CD disc of email communications between you and Tim Anderson. Please identify the emails for which you claim the privilege and state the basis for each claim. As noted in my email correspondence to you dated April 25, 2016, it will be your responsibility to defend any such claim of privilege with the SEC. You must respond to me in writing and as directed above no later than **5 p.m. on June 8, 2016**.

Very truly yours,

LINDA DALE HOFFA

Encl. One (1) CD disc  
cc w/out encl. Paul Grand Esq.  
Morvillo Abramowitz  
565 5th Ave, NYC, NY. 10017

**UPS CampusShip: View/Print Label**

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.

2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. **GETTING YOUR SHIPMENT TO UPS**

**Customers with a Daily Pickup**

Your driver will pickup your shipment(s) as usual.

**Customers without a Daily Pickup**

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.


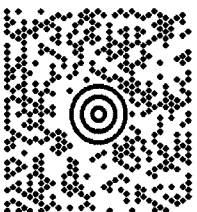
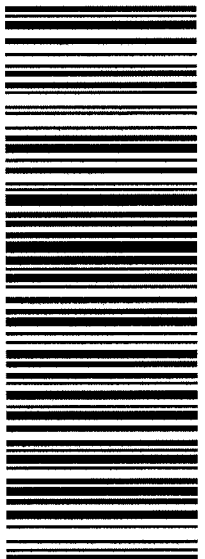

Hand the package to any UPS driver in your area.

UPS Access Point™  
THE UPS STORE  
1735 MARKET ST  
PHILADELPHIA ,PA 19103

UPS Access Point™  
NUTS TO YOU  
1328 WALNUT ST  
PHILADELPHIA ,PA 19107

UPS Access Point™  
THE UPS STORE  
1229 CHESTNUT ST  
PHILADELPHIA ,PA 19107

FOLD HERE

<p>LINDA DALE HOFFA 215.575.7288 DILWORTH PAXSON - PHILADELPHIA 1500 MARKET STREET PHILADELPHIA PA 19102</p> <p><b>SHIP TO:</b> JOHN GALANIS SUITE 1014 15575 JIMMY DUARTE BLVD. <b>DEL MAR CA 92014-1901</b></p>	<p>0.0 LBS LTR 1 OF 1</p> <p><b>CA 921 9-08</b></p>  	<p><b>UPS NEXT DAY AIR</b></p> <p>TRACKING #: 1Z V69 50R 01 9720 6167</p>		<p>BILLING: P/P</p> <p>Client/Matter: 99001/00141 Attorney Name: John Galanis</p> <p>CS 18.1.15. WNT1E100 75.0A 04/2016</p> 
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Jason Galanis  
1920 Bel Air Road  
Los Angeles, CA 90077

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FOLD HERE

LINDA DALE HOFFA 215.575.7288 DILWORTH PAXSON - PHILADELPHIA 1500 MARKET STREET PHILADELPHIA PA 19102  <b>SHIP TO:</b> JASON GALANIS 1920 BEL AIR ROAD <b>LOS ANGELES CA 90077-2727</b>	<b>0.0 LBS LTR</b>  <b>1 OF 1</b>
	<b>CA 900 3-10</b> 
<b>UPS NEXT DAY AIR</b> TRACKING #: 1Z V69 50R 01 9955 6179	
<b>BILLING: P/P</b>	 Client/Matter: 99001/00141 Attorney Name: Linda Dale Hoffa <small>CS 18.1.15. WNTIE100 75.0A 04/2016</small>